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# UNITED STATES DISTRICT COURT **DISTRICT OF NEVADA**

VALLEY HEALTH SYSTEM, LLC, a Delaware Limited Liability company, DVH HOSPITAL ALLIANCE, LLC, a Delaware Limited Liability company, and SUMMERLIN HOSPITAL MEDICAL CENTER, LLC, a Delaware Limited Liability company,

Plaintiff,

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TRAVEL INSURANCE FACILITIES, PLC, a Foreign Corporation, UNION REISEVERSICHERUNG AKTIENGESELLSCHAFT, a Foreign Corporation.

Defendant.

CASE NO.: 2:22-cv-00365-ART-DJA

STIPULATION AND ORDER TO **EXTEND TIME FOR TRAVEL INSURANCE FACILITIES, PLC TO** FILE ITS RESPONSIVE PLEADING TO PLAINTIFFS' FIRST AMENDED COMPLAINT

(FIRST REQUEST)

IT IS HEREBY STIPULATED AND AGREED by and between Defendant TRAVEL INSURANCE FACILITIES, PLC ("TIF" or "Defendant") by and through its counsel of record, Pat Lundvall, Esq. and Daniel Aguino, Esq. of the law firm McDonald Carano and Plaintiffs VALLEY HEALTH SYSTEM, LLC; DVH HOSPITAL ALLIANCE, LLC, and SUMMERLIN HOSPITAL MEDICAL CENTER, LLC (collectively, "Plaintiffs") by and through their counsel of record, Timothy M. Hartley, Esq. (admitted *pro hac vice*) of the Hartley Law Offices and Jason M. Wiley, Esq. of the law firm Wiley Petersen, to extend the time for TIF to file its responsive pleading to Plaintiffs' First Amended Complaint (ECF No. 23) up to and including March 10, 2023.

TIF was served with Plaintiffs' First Amended Complaint on or about February 2, 2023. The parties are continuing to engage in settlement negotiations regarding Plaintiffs' claims. As Plaintiffs' deadline to respond to UNION REISEVERSICHERUNG AKTIENGESELLSCHAFT's (URV) Motion to Dismiss has been extended to March 10, 2023 (ECF No. 47), TIF and Plaintiffs have likewise agreed to extend TIF's deadline to file its responsive pleading to March 10, 2023, to allow the parties time to continue settlement discussions.

The stipulation is made in good faith and not for purposes of delay.

## McDONALD CARANO LLP

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### IT IS SO ORDERED.

DATED: February 22, 2023

DANIEL J. ALBREGTS

UNITED STATES MAGISTRATE JUDGE